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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF EXHIBIT
A TO NOTICE ATTACHING EXHIBITS
FROM AUGUST 23, 2017 HEARING**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of Exhibit A to Notice Attaching Exhibits from August 23, 2017 Hearing (“Exhibit A”),
8 filed concurrently herewith (the “Administrative Motion”). The Administrative Motion seeks an order
9 sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit A	Portions marked in red box	Waymo

12
13 3. Specifically, the portions of Exhibit A marked in the red box contain, refer, or tend to
14 disclose trade secret information, which Waymo seeks to seal.

15 4. The red boxed portions of Exhibit A contain, reference, and/or tend to disclose
16 Waymo’s trade secrets. The information Waymo seeks to seal, in context, may tend to disclose the
17 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, including
18 its LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are
19 maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s
20 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors
21 access to descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
22 information were made public, I understand that Waymo’s competitive standing would be
23 significantly harmed.

24 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibit A that merit
25 sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on September 1, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC
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8

9 **SIGNATURE ATTESTATION**

10 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
11 filing of this document has been obtained from Felipe Corredor.

12 /s/ Charles K. Verhoeven

13 Charles K. Verhoeven
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